

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

IN RE:	§	CASE NO. 21-60052
	§	
SCOTT VINCENT VAN DYKE,	§	CHAPTER 7
	§	
DEBTOR	§	JUDGE CHRISTOPHER M. LOPEZ

**CATHERINE STONE CURTIS, CHAPTER 7 TRUSTEE’S JOINDER TO OBJECTION
OF EVA S. ENGELHART, CHAPTER 7 TRUSTEE OF THE ESTATE OF ANGLO-
DUTCH PETROLEUM INTERNATIONAL, INC., TO THE MOTION FOR RELIEF
FROM AUTOMATIC STAY AS TO 1515 SOUTH BLVD., HOUSTON, TX, 77006**

[Relates to Dkt. Nos. 175 and 179]

Catherine Stone Curtis, Chapter 7 Trustee of the above-referenced bankruptcy estate (“**Trustee**”) respectfully submits this Joinder to Objection of Eva S. Engelhart, Chapter 7 Trustee of the Estate of Anglo-Dutch Petroleum International, Inc., to Motion for Relief from Automatic Stay as to 1515 South Blvd., Houston, TX, 77006 (the “**Joinder**”), and in support thereof respectfully states as follows:

1. On May 27, 2022, Cadence Bank, as Successor by Merger to Cadence Bank, N.A., as Successor by Merger to Encore Bank, National Association filed its Motion for Relief from Automatic Stay as to 1515 South Blvd., Houston, TX, 77006 (“**Lift Stay Motion**”) (Dkt. No. 175).
2. On June 14, 2022, Eva S. Engelhart, Chapter 7 Trustee of the Estate of Anglo-Dutch Petroleum International, Inc., filed her Objection to Motion for Relief from Automatic Stay as to 1515 South Blvd., Houston, TX, 77006 (the “**Engelhart Objection**”) (Dkt. No. 179). Engelhart is one of, if not, the largest unsecured creditors in this bankruptcy case.
3. Trustee joins in the Engelhart Objection and incorporates it herein by reference.
4. In addition to requesting the relief described in the Engelhart Objection, Trustee asks, in the alternative, for a twelve-month delay in entering an automatic stay order so that the

Trustee may market the property located at 1515 South Blvd., Houston, TX, 77006 (the “**Property**”), in order to maximize value of the Debtor’s Estate. Trustee intends to file an Objection to the Claimed Exemptions, which will include an objection to Debtor’s claimed homestead exemption for the Property.

Dated: June 15, 2022

Respectfully submitted,

CHAPTER 7 TRUSTEE

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**General Counsel to Catherine Stone
Curtis, Chapter 7 Trustee**

CERTIFICATE OF SERVICE

I certify that on the 15th day of June 2022, a true and correct copy of the foregoing was served on the Debtor, counsel for the Debtor, the Trustee and the US Trustee via regular US Mail, unless otherwise served by the CM-ECF system.

/s/ Lynn Hamilton Butler
Lynn Hamilton Butler